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9 Attorney for Defendant  
10 CLIFTON BURCH

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14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA

16  
17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 v.

20 ERIC WORTHEN, TAJ ARMON REID,  
21 a/k/a TAJ REID, DERF BUTLER,  
22 ANTON KALAFATI, CLIFTON BURCH,  
23 PETER MCKEAN, LEN TURNER, and  
24 LANCE TURNER,

25 Defendants.

26 Case No. 3:17-cr-00175 CRB

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28 **DEFENDANT CLIFTON BURCH'S  
RESPONSE TO GOVERNMENT MOTION  
REGARDING ENTRAPMENT**

Date: Sept. 18, 2018  
Time: 2:00 p.m.  
Judge: Hon. Charles Breyer  
Dept.: Courtroom 6. 17th Floor

1           Defendant Clifton Burch responds to the Government's Motion for Disclosure of Intent to Raise  
2 Entrapment Defense (ECF no. 251) as follows.

3           In its motion, the Government asks the Court to require notice and an offer or proof before an  
4 entrapment defense can be raised to a jury at trial. The Government does not ask that an entrapment  
5 defense be precluded at this time, but that the defense be required to give notice and make a *prima facie*  
6 offer of proof before the defense may be raised.

7           Defendant Burch does not oppose the motion and will give reasonable notice and an offer of  
8 proof before raising such a defense at trial.

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10           Dated: September 4, 2018

Respectfully submitted,

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12           By: /s/ Eduardo G. Roy  
13           EDUARDO G. ROY  
14           Attorney for Defendant  
15           CLIFTON BURCH  
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